

October 18, 2013

The Director / Principal / Dean / HOD

Dear Sir / Madam

Sub: Invitation to participate in the Surana & Surana National Corporate Law Moot Court Competition 2014

Greetings!

Hope this reaches you in best of health and spirits.

On behalf of Prof. K S Suresh, Principal, JSS Law College, Mysore and Surana & Surana International Attorneys, Chennai, I have great pleasure in inviting you to the Surana & Surana National Corporate Law Moot Court Competition- 2014 to be held in JSS Law College, Mysore from 7 – 9 February 2014

The case and Rules for the competition are enclosed. This year's problem is based on law relating to Transfer Pricing under the Income-tax Act, 1961 and the significant development made in this regard by the Government of India at par with international standards by introducing Advance Pricing Agreement (APA).

APA was introduced by the US, Canada and the UK to break a deal with international investors (both inbound and outbound) to make them pay their fair share of income taxes. Under APA, both the taxpayer and the concerned tax department enter into an agreement called the APA with regard to the tax to be paid on a proposed international transaction for a particular number of years to avoid any dispute between them when the businesses is on. However, smart taxpayers as they would usually do and that laws are first subject to misuse, used APA to avoid several billion dollars of tax leaving the tax departments red faced yet unable to legally prevent them from doing so.

This case study is one such instance to challenge the students to prepare for both sides to justify such aggressive tax planning and also to help the Indian tax department to be cautious of such situations and to appropriately react to such tax planning's.

We believe your students will be highly benefitted by participating and preparing for this moot competition and to be up to date on such advancement in the field of law and to strike the balance between legality and morality while advising clients on tax matters.

We look forward for your institution's representation in this moot".

The case and the rules can also be downloaded from [www.moot.in](http://www.moot.in)

Warm regards  
Sincerely

Preetam Surana  
Email: mootcourt@lawindia.com

Encl: Case & Rules for the Surana & Surana National Corporate Law Moot Court Competition 2014